

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: RICHARD MARVIN HARDY , aka	:	Chapter 13
Richard M. Hardy, aka Richard Hardy, and	:	Case No. 5:15-bk-04647-JJT
KIMBERLY JAN HARDY , aka	:	
Kimberly J. Hardy, aka Kimberly Hardy,	:	
Debtors		

HOMEBRIDGE FINANCIAL SERVICES, INC. ,	:	
Movants	:	Motion for
v.	:	Relief from Stay
RICHARD MARVIN HARDY ,	:	
KIMBERLY JAN HARDY , and	:	
CHARLES J. DEHART, ESQUIRE, TRUSTEE ,	:	
Respondent	:	

**ANSWER TO MOTION OF
HOMEBRIDGE FINANCIAL SERVICES FOR RELIEF FROM STAY**

AND NOW COMES Debtors **RICHARD MARVIN HARDY** and **KIMBERLY JAN HARDY**, by and through their attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., with Answer to Motion of **HOMEBRIDGE FINANCIAL SERVICES** for Relief from Stay, and in support thereof aver:

1. Admitted.
2. Admitted.
3. Denied. Upon information and belief, the Trustee was appointed by the Office of the United States Trustee.
4. Denied to the extent the referenced documents do not speak for themselves.
5. Admitted.

6. Admitted. Historically, Debtor Richard Marvin Hardy has relied upon a payment booklet or other proof of the mortgage payment due, supplied by HomeBridge and/or CENLAR, also known as Central Loan Administration & Reporting, in order to obtain funds from his union to maintain mortgage payments during period of low income and/or high expenses, which is typical of the winter months.

7. Denied. Debtors' Confirmed Second Amended Chapter 13 Plan provides for \$6,000 in postpetition mortgage arrearages. Additionally, Debtors anticipate tendering a \$10,000 certified/cashier's check to HomeBridge and/or CENLAR, via KML Law Group, P.C., in advance of the February 14, 2017, hearing on this Motion for Relief. Debtors await an indication of to which entity the certified/cashier's check should be payable.

8. Denied. Debtor's lack sufficient information and belief to Admit or Deny the averments of paragraph 8 and such are therefore Denied.

9. Denied to the extent the averments of paragraph 9 are other than a statement or conclusion of law that does not require a response.

WHEREFORE, Debtors **RICHARD MARVIN HARDY** and **KIMBERLY JAN HARDY** respectfully pray this Honorable Court for an Order that the Motion of **HOMEBRIDGE FINANCIAL SERVICES** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

By: /s/ J. Zac Christman
J. ZAC CHRISTMAN, ESQUIRE
Attorney for Debtors
712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
jchristman@newmanwilliams.com